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January 25, 2018

CMI Claims Management Inc.  
Attn: Justin Mills  
P.O. Box 14731  
Lexington, KY 40512

**VIA CERTIFIED MAIL & RETURN RECEIPT**  
**7015 3430 0000 8774 3110**

**Re: Your Policy Holder: Walmart Stores, Inc**  
**Claim Number: 7903975**  
**Incident Date: 10/16/2016**  
**Our Client: Linda Watts**

**Amended Demand**

Dear Mr. Mills:

As previously advised, this firm represents the above named client for injuries sustained in a slip and fall accident at your Walmart Store located at 6435 Bells Ferry Road in Woodstock, GA 30189 on October 16, 2016. Since this is a settlement letter, all of its terms are privileged and confidential. None of the statements made in this letter shall be deemed admissible in any proceeding should our settlement efforts fail.

On October 16, 2016, Linda Watts was an invitee at Walmart Store, Inc. in Woodstock, GA when she slipped on a wet floor and fell to the ground. Upon her falling, she landed **striking the whole right side of her body**. Ms. Watts immediately felt pain and discomfort upon falling and reported the same. During the course of her medical examinations and treatment with various specialists, it was determined that she required surgery to repair a **torn rotator cuff**. Georgia law is applicable in this case. Claims Management Inc. is the insurer on this claim and Walmart Stores, Inc. is aware of our representation of Ms. Linda Watts.

In our original demand we reported **\$31,140.98** in medical records and bills incurred by my client. That amount included treatment received at the time of the demand along with any future medical treatment that she may require as a result of this incident.



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Due to the severity of the injury, our client decided to have her torn rotator cuff repaired. Therefore we are submitting all her records and bills to date from her treatment facilities below:

<b>Medical Service Provider:</b>	<b>Amount</b>
Wellstar Kennestone	\$ 2,850.50
Bortolazzo Group, LLC	\$ 790.00
Quantum Radiology	\$ 111.00
Resurgens Orthopaedics	\$ 27,389.48
Mak Anesthesia Providers, LLC	\$ 2,530.00
Northwest Georgia Orthopaedics	\$ 28,948.00
East West Surgery Center	\$ 10,300.00
<b>TOTAL</b>	<b>\$ 72,918.98</b>

Ms. Watts sustained the following injuries: Pain in Right Shoulder (M25.511), Pain in Right Wrist (M25.531), Stiffness of Right Shoulder, not elsewhere classified (M25.611), Radiculopathy, Cervical Region (M54.12), Impingement Syndrome of Right Shoulder (M75.41), Unspecified Rotator Cuff Tear or Rupture of Right Shoulder, not specified as Traumatic (M75.101), Myalgia (M79.1).

Ms. Watts suffered a 13mm Avulsion Fracture of her Right Shoulder arising from the Inferior aspect of the right Glenoid. Her Acromioclavicular Joint is widened to 8mm suggesting separation. Ms. Watts had a MRI of her Right Shoulder performed which revealed Joint Effusion, full thickness Rotator Cuff Tear and a Bony Bankart with Right Shoulder Impingement. Due to this diagnosis Ms. Watts had to have a Right Shoulder Arthroscopy, Decompression and Rotator Cuff Repair. In addition, she had Pushlock and Swivelock anchors implanted in her shoulder. This surgery was performed by Dr. Jacob Strong at the East West Surgery Center.

A MRI of the Cervical Spine was also performed and revealed a Bulging Disc at C3-4, Severe Stenosis at C5-6 and a Disc Protrusion at C7-T1.

Additionally, Ms. Watts was prescribed what is called an Iceman Clearcube and has received four Epidural Injections. Ms. Watts is a 60 year old woman who will continue to experience extreme pain and discomfort in her arm and shoulder area due to her fall. This injury has frightened her whenever she goes into a store in fear of falling again. She was prescribed Ambian to assist in sleep along with Lortab and Tramadol.

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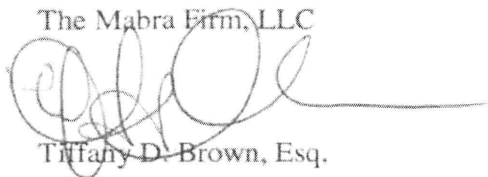
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Our client would like to put this matter behind her and move on with her life. Please review the additional documentation that has been presented and contact our office with an offer. Please note that unless we agree to an extension in writing, the previous deadline from our demand dated November 9, 2017 will not be extended.

Thank you for your time and consideration. We look forward to resolving this case in a timely manner.

The Mabra Firm, LLC

A handwritten signature in black ink, appearing to read 'Tiffany D. Brown', with a long horizontal flourish extending to the right.

Tiffany D. Brown, Esq.

TDB/rb

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